

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEBRA M. BRAND

Plaintiff,

V.

Case No. 08-751

THE AMERITECH SICKNESS & ACCIDENT DISABILITY BENEFIT PLAN,

Judge Leinenweber
Magistrate Judge Denlow

Defendant.

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant, The Ameritech Sickness and Accident Disability Benefit Plan (the “Plan”), by its attorney, Stephen B. Mead, respectfully requests that the Court grant it an extension, to and including March 10, 2008, to file an Answer or otherwise plead in response to Plaintiff’s Complaint. Defendant states the following in support of its motion:

1. Plaintiff filed the Complaint asserting she was denied benefits in violation of the Employee Retirement Income Security Act (29 U.S.C. §§ 1001-1461) on or about December 18, 2007, in the Circuit Court of Cook County, Illinois.

2. Plaintiff served the Complaint by process server on January 8, 2008, and Defendant removed the matter to this Court on February 4, 2008, pursuant to 28 U.S.C. § 1441.

3. Pursuant to Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure, Defendant's answer or other responsive pleading to the Complaint is due on or before Monday, February 11, 2008.

4. Defendant needs additional time to investigate the allegations in Plaintiff's Complaint and formulate its response thereto.

5. Defendant requests additional time, to and including March 10, 2008, to answer or otherwise plead to Plaintiff's Complaint.

6. On February 7, 2008, Plaintiff's counsel, Douglas M. Belofsky, informed Defendant's counsel, Stephen B. Mead, that he agreed to this motion.

7. This is Defendant's first motion for an extension of time.

WHEREFORE, Defendant respectfully requests that the Court enter an order granting Defendant's motion, and extending the time for Defendant to file its answer or other responsive pleading, to and including March 10, 2008.

Dated: February 11, 2008

Respectfully submitted,

THE AMERITECH SICKNESS
& ACCIDENT DISABILITY
BENEFIT PLAN

By: /s/ Stephen B. Mead
Its Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February, 2008, I electronically filed the foregoing **AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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s/ Stephen B. Mead _____
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